

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

AMERICAN PATENTS LLC,

Plaintiff,

v.

COOLPAD GROUP LIMITED, et al.,

Defendants.

CIVIL ACTION NO. 4:19-cv-877-ALM

JURY TRIAL DEMANDED

JOINT SUBMISSION REGARDING SEPTEMBER 3, 2020 TELECONFERENCE

Complying with the Court's instructions on the September 3, 2020 teleconference in this case, Plaintiff American Patents LLC ("American Patents") and Defendants Coolpad Group Limited, Coolpad Technologies Inc., and Yulong Computer Telecommunication Scientific (Shenzhen) Co. Ltd. ("Coolpad") (together, "Defendants") jointly submit the below listed documents for the Court's consideration:

- Ex. 1: Defendants' P.R. 3-3 Invalidity Contentions (Note: This document includes Defendants' invalidity contentions cover page and not the multiple exhibits that were initially attached and served on Plaintiff.)
- Ex. 2: Defendants' P.R. 4-1 Disclosures
- Ex. 3: Defendants' Shortened List of Terms Email
- Ex. 4: Defendants' P.R. 4-2 Disclosures
- Ex. 5: Plaintiff's P.R. 4-2 Disclosures
- Ex. 6: Email Chain Discussing Coolpad Proposal
- Ex. 7: Joint P.R. 4-3 Claim Construction and Prehearing Statement

- Ex. 8: Joint P.R. 4-3 – Exhibit 1
- Ex. 9: Declaration of Paul S. Min Ph.D
- Ex. 10: Petition in IPR2020-01178 filed by HPE, Aruba, and Coolpad
- Ex. 11: *Karl Storz Endoscopy-America, Inc. v. Stryker Corp.*, 2017 WL 5257001 (N.D. Cal. Nov. 13, 2017)
- Ex. 12: *MediaTek Inc. v. Freescale Semiconductor, Inc.*, 2014 WL 690161 (N.D. Cal. Feb. 21, 2014)
- Ex. 13: *Seven Networks, LLC v. Google LLC*, 2018 WL 4501952 (E.D. Tex. Jul. 11, 2018)
- Ex. 14: *Uniloc 2017 LLC v. Samsung Elecs. Am., Inc.*, 2019 WL 8039081 (E.D. Tex. Nov. 22, 2019)
- Ex. 15: *Advanced Mktg. Sys., LLC v. CVS Pharmacy, Inc.*, 2016 WL 1741396 (E.D. Tex. May 3, 2016)
- Ex. 16: *Arbitron, Inc. v. Int'l Demographics Inc.*, 2008 WL 4755761 (E.D. Tex. Oct. 29, 2008)
- Ex. 17: *Infernal Tech., LLC v. Sony Interactive Entm't Am., LLC*, 2020 WL 3050821 (E.D. Tex. June 8, 2020)
- Ex. 18: *Phoenix Licensing, L.L.C. v. AAA Life Ins. Co.*, 2015 WL 11110605 (E.D. Tex. Apr. 7, 2015)
- Ex. 19: *Samsung Elecs. Am., Inc. v. Prisua Eng'g Corp.*, 948 F.3d 1342 (Fed. Cir. 2020)
- Ex. 20: *SBJ IP Holdings 1, LLC. v. Blockbuster Inc.*, 2011 WL 903194 (E.D. Tex. Mar. 15, 2011)

- Ex. 21: *Praxair, Inc. v. ATMI, Inc.*, 543 F.3d 1306 (Fed. Cir. 2008)

The parties note that Coolpad has dropped its assertion that claim terms 8-12 of the 803 patent (using the numbering from the P.R. 4-3 filing) are indefinite. Those terms are discussed in Dr. Min's declaration in paragraphs 174-206.

Dated: September 4, 2020

Respectfully submitted,

/s/ Christopher Ryan Pinckney

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